# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

TQ DELTA, LLC,	Dlaintiff	Civil Action No. 12 ov. 1925 DCA
V.	Plaintiff,	Civil Action No. 13-cv-1835-RGA
٧.		
2WIRE, INC.		
	Defendant.	
TQ DELTA, LLC,		
	Plaintiff,	Civil Action No. 13-cv-2013-RGA
V.		
ZYXEL COMMUNICATIONS, INC. and		
ZYXEL	COMMUNICATIONS	
CORPORATION,		
	Defendants.	
TQ DELTA, LLC,	D1 : 4:00	C' 'I A d' NI 14 OSA DOA
V.	Plaintiff,	Civil Action No. 14-cv-954-RGA
٧.		
ADTRAN, INC.		
,	Defendant.	
ADTRAN, INC,		
	Plaintiff,	Civil Action No. 15-cv-121-RGA
V.		
TQ DELTA, LLC.		
	Defendant.	

## FAMILY 3 PATENTS AMENDED JOINT CLAIM CONSTRUCTION CHART

On May 31, 2017, pursuant to ¶ 9 of the Court's Third and Final Scheduling Order<sup>1</sup>, Plaintiff TQ Delta, LLC and Defendants in the above-captioned cases submitted their Joint Claim Construction Chart ("Chart")<sup>2</sup> for the Family 3 Patents (U.S. Patent Nos. 7,831,890 ("the '890 patent"), 7,836,381 ("the '381 patent"), 7,844,882 ("the '882 patent"), 8,276,048 ("the '048 patent"), 8,495,473 ("the '873 patent") and 8,607,126 ("the '126 patent")). On November 13,

<sup>&</sup>lt;sup>1</sup> See, e.g., TQ Delta LLC v. 2Wire, Inc., 13-cv-01835-RGA, D.I. 280, April 10, 2017.

<sup>&</sup>lt;sup>2</sup> See, e.g., Id., D.I. 312, May 31, 2017.

2017, the Court held a *Markman* hearing for the terms identified in said Chart, and whereupon after hearing the parties' arguments, instructed the parties to meet and confer to attempt to resolve their disputes with respective to certain terms identified in said Chart. Following a meet and confer, the parties reached agreement as to the construction of said terms. The Amended Joint Claim Construction Chart ("Amended Chart"), attached herewith as Exhibit A, reflects the parties' agreed to constructions for said terms, as well as the parties' respective proposed constructions of the disputed language of the asserted claims of the Family 3 Patents and citations to the parties' intrinsic evidence in support of their respective proposed constructions.

In addition to the Amended Joint Claim Construction Chart, copies of the Family 3

Patents and additional portions of the intrinsic record are attached as Exhibits B–H:

Exhibit	Description
В	'890 patent
C	'381 patent
D	'048 patent
Е	'473 patent
F	'873 patent
G	'126 patent
Н	Excerpts of the '890 patent file history

Dated: December 4, 2017

FARNAN LLP

## /s/ Michael J. Farnan

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Respectfully submitted,

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